

STATE OF MISSOURI  
**DEPARTMENT OF NATURAL RESOURCES**

Matt Blunt, Governor • Doyle Childers, Director

[www.dnr.mo.gov](http://www.dnr.mo.gov)

December 1, 2005

Mr. Dan Wall  
U.S. EPA, Region VII  
901 N. 5<sup>th</sup> Street  
Kansas City, KS 66101



RE: Memorandum of Remedial Action Objectives, West Lake Landfill Operable  
Unit 2, Bridgeton, Missouri

Dear Mr. Wall:

The Missouri Department of Natural Resources has reviewed the above referenced memorandum and are transmitting the comments below for consideration and response.

- **OU-2 Site Boundary** – It is not clear how the scope of the RI/FS and ROD will address the different areas of OU-2. The above referenced letter states that the demolition landfill area and the active permitted area are part of OU-2, yet they are excluding these areas from the FS. Since all of these areas are inter-connected via land, groundwater, landfill gas flow etc., shouldn't the area as a whole be analyzed in the FS in order to see the big picture? For example, shouldn't there be a discussion on how the active landfill gas collection system will impact landfill gas at the inactive site. This applies to groundwater and the leachate pumps also.
- **Landfill Gas** – Radon gas is not included as a potential landfill gas. How does radon gas generated in OU-1 effect OU-2? In what ways will the active landfill gas collection system or any other OU-2 remedial alternative effect radon gas flow? Will radon gas mix with other landfill gases and migrate onto OU-2? Will it migrate off-site?
- **Landfill Gas Collection** – The active permitted landfill has an operating gas collection system. Why not tie OU-2 into this system? There needs to be a discussion on how systems (gas collection, leachate collection, etc) at the active permitted landfill will or could impact or compliment the remedy for OU-2.
- **O&M and IC's** – Although not listed as a remedial action objective, operation and maintenance that includes institutional controls must be an essential part of the alternatives in the FS.

Mr. Dan Wall

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Thank you for giving us the opportunity to review and comment on this document. If you have any questions or need further clarification, please call me at (573) 751-3087.

Address any written communication to my attention at the Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "Darrick Steen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Darrick Steen, Environmental Engineer  
Federal Facilities Section

DS:dd

c: Tim Duggan, Missouri Attorney Generals Office  
Larry Erickson, Hazardous Waste Program  
Scott Waltrip, Solid Waste Management Program